

EXHIBIT D

Christie Andrews v. Tri Star Sports and Entertainment Group, Inc.

**Christie Andrews
August 23, 2022**

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Christie Andrews 8/23/2022

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
AT NASHVILLE

CHRISTIE ANDREWS)	
)	
PLAINTIFF,)	
)	
)	
vs.)	CASE NO. 3:21-CV-00526
)	
TRI STAR SPORTS AND)	Judge Eli J. Richardson
ENTERTAINMENT GROUP, INC.,)	Magistrate Judge
)	Jefferey S. Frensley
)	
DEFENDANT.)	JURY DEMAND
)	

VIDEO DEPOSITION OF CHRISTIE ANDREWS

Taken at the instance of the Defendant at
Arciniegas Law, 1242 Old Hillsboro Road, Franklin,
TN, on Tuesday,
August 23, 2022,
beginning at 9:29 a.m.

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14 ALSO PRESENT: Margaret Stephens

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16 VIDEOGRAPHER: Sarah Hogue

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Christie Andrews 8/23/2022

1 A. It was my school sports physical.

2 Q. Had you noticed any symptoms of asthma
3 before?

4 A. I thought I was just, like, a really bad
5 runner, is what I thought was happening. I hadn't
6 experienced anything as far as, like, my normal
7 triggers that I know now to be triggers.

8 I thought that what -- like, I just
9 thought the things that I had experienced in the
10 past were, like, normal things, and I didn't know
11 they weren't normal until the doctors said that's
12 not normal.

13 Q. Okay. And what kinds of things do you
14 mean?

15 A. Like some of my triggers, for instance,
16 are, like, I can't -- like, if, like, wind is
17 blowing in my face, I could, like, not be able to
18 breathe, and, like, that's apparently not a normal
19 thing. And, like, being in the cold, like, makes
20 everything kind of constrict and be a problem.

21 So I just -- again, I just thought this
22 was, like, what everyone experienced. I didn't
23 know it was anything to be alarmed about, but --
24 and I had never had a serious attack except for,
25 like, while running. And that was always -- I

Christie Andrews 8/23/2022

1 would have to, like, sit down and coach myself
2 back into breathing, and sometimes that would,
3 like, make you -- me, like, physically sick,
4 because you get kind of an adrenaline dump that
5 happens when you can't breathe.

6 So that was the only thing that was
7 happening, like, while I was running that -- and
8 again, I just thought I was a bad runner. I
9 didn't know what it was.

10 Q. Did you tell -- when did you first tell
11 Tri Star that you had asthma?

12 A. I first told Tri Star about asthma when
13 I first started working there in 2014.

14 Q. On the emergency contact form?

15 A. Yes.

16 Q. Okay. Let's go ahead and make that an
17 exhibit, 11.

18 A. Oh, no, I've kind of messed things up as
19 far as movement.

20 (Exhibit 11 marked for identification.)

21 Q. (By Ms. Hart) So I've handed you
22 Exhibit 11.

23 A. Yes.

24 Q. And this is marked at the top
25 "Plaintiff's Production 9", and it's an emergency

Christie Andrews 8/23/2022

1 there's things I can't do.

2 Q. (By Ms. Hart) Okay. So do you perceive
3 yourself as disabled because of your asthma?

4 MR. ARCINIEGAS: Object to form.

5 THE WITNESS: I perceive myself as
6 someone who has to deal with this every day
7 and try not to let it get in my way.

8 Q. (By Ms. Hart) Do you perceive yourself
9 as disabled because of your asthma?

10 MR. ARCINIEGAS: Same objection.

11 THE WITNESS: I mean, I guess, yes. I'm
12 not, like, handicapped. I don't need a
13 handicapped placard, but, yeah, I mean, it's
14 debilitating sometimes.

15 Q. (By Ms. Hart) All right. You said
16 "it's debilitating some times," right?

17 A. (Witness nods head affirmatively.)

18 Q. Okay. How is it debilitating?

19 A. Well, for instance, after I have an
20 attack, if I don't get over it within a few days,
21 I can end up with bronchitis or pneumonia, and
22 then it does get in the way of my day to day. I
23 end up -- I'm sick and, you know, I can't do
24 anything. I can't move around a lot.

25 Q. What do you mean you can't move around?

Christie Andrews 8/23/2022

1 A. Like, I would have shortness of breath
2 if I was up and moving around.

3 Q. How often does that happen?

4 A. Well, I guess it would -- it depends on,
5 like -- it happens a lot more often, like, in the
6 winter. I tend to get sick and get bronchitis
7 more often in the colder months, so -- but in the
8 summertime, I tend to bounce back faster.

9 Q. Are there any other ways that you --
10 that asthma is debilitating to you, or have we
11 talked about everything?

12 MR. ARCINIEGAS: Object to form.

13 THE WITNESS: I mean, I feel like there
14 are a lot of things that I would -- that I
15 would like to do that I choose not to do
16 because I know it would be a problem.

17 Q. (By Ms. Hart) Okay.

18 A. And I don't know, I feel like that every
19 time that I do catch, like, a cold or something
20 simple, it always turns into something worse. So
21 that's a problem as well. So it's -- I don't
22 know. I mean, it's -- there are things I can't do
23 because of it, and there are ways that it makes
24 life harder.

25 Q. Okay. You said there's things you would